

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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RIVKA MANDEL,

CIVIL ACTION NO. 23-CV-7352 NRM-VMS

Plaintiff,

v.

STIPULATION

JACOB DASKAL,

Defendant.

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IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for Plaintiff Rivka Mandel (“Plaintiff”) and Defendant Jacob Daskal (“Defendant”) that Defendant will have until November 30, 2023 to answer, move against, or otherwise respond to the Complaint.

IT IS HEREBY FURTHER STIPULATED AND AGREED that Plaintiff expressly reserves the right to file, before a responsive pleading is served, any motion which plaintiff believes appropriate, including, without limitation, applications for injunctive relief, and an amended complaint identifying other defendants and relief defendants.

IT IS HEREBY FURTHER STIPULATED AND AGREED that notwithstanding any other provision of this Stipulation, Defendant is not waiving any of his legal rights and/or remedies, including, without limitation, to seek dismissal of this action for lack of subject matter jurisdiction.

Dated: November 2, 2023
New York, New York

PAUL BATISTA, P.C.

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